

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

<b>DINO N. THEODORE</b>	)	
<b>and ACCESS WITH SUCCESS, INC.,</b>	)	
<b>Plaintiffs</b>	)	<b>CASE NO.: 1:13-cv-162JD</b>
	)	
<b>v.</b>	)	
	)	
<b>TMT SALEM PARK PLAZA, INC.,</b>	)	
<b>Defendant</b>	)	

**PLAINTIFFS' MOTION TO RE-OPEN CASE**

The plaintiffs, Dino N. Theodore and Access with Success, Inc., respectfully move the Court pursuant to Fed. R. Civ. P. 60 for relief from an order entered on May 8, 2013 terminating this civil case. For the reasons set forth in the accompanying memorandum of law and affidavit of counsel, the plaintiffs respectfully request that they will be relieved from the order as permitted by Fed. R. Civ. P. 60(b)(1) on grounds of mistake and inadvertence and that the case will be re-opened.

WHEREFORE the plaintiffs pray that their motion will be granted.

Respectfully submitted,  
The Plaintiffs, DINO THEODORE, et al.,

By their Attorneys,

/s/Nicholas S. Guerrero  
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